

**Objection Deadline: January 23, 2024**

BURNS BAIR LLP

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*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:  
THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11  
Case No. 20-12345 (MG)

**THIRTY-SEVENTH MONTHLY FEE STATEMENT OF BURNS BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
NOVEMBER 1, 2023 THROUGH NOVEMBER 30, 2023**

Name of Applicant:

Burns Bair LLP

Authorized to Provide Professional  
Services to:

Official Committee of Unsecured Creditors

Date of Retention:

Effective October 29, 2020 pursuant to Order  
dated December 9, 2020 [Docket No. 246]

Period for which compensation and  
reimbursement is sought:

November 1, 2023 – November 30, 2023

Amount of Compensation sought as actual,  
reasonable, and necessary:

\$49,421.00  
50% of which is \$24,710.50

Amount of Expense Reimbursement sought  
as actual, reasonable, and necessary:

\$0

TOTAL (50% of fees and 100% of costs)

\$24,710.50

**This is the thirty-seventh monthly fee statement.**

## **PRELIMINARY STATEMENT**

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this thirty-seventh monthly statement (the “Monthly Statement”) for the period from November 1, 2023 through November 30, 2023 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests interim allowance and payment of compensation in the amount of \$24,710.50 (50% of \$49,421.00) for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair.

### **FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

| Name                | Title     | Year of Partnership | Year of Admission | Hourly Rate | Total Hours Billed | Total Compensation |
|---------------------|-----------|---------------------|-------------------|-------------|--------------------|--------------------|
| Timothy Burns       | Partner   | 2008                | 1991              | \$975.00    | 23.30              | \$22,717.50        |
| Jesse Bair          | Partner   | 2020                | 2013              | \$625.00    | 32.30              | \$20,187.50        |
| Brian Cawley        | Associate | N/A                 | 2020              | \$420.00    | 6.20               | \$2,604.00         |
| Nathan Kuenzi       | Associate | N/A                 | 2020              | \$420.00    | 5.80               | \$2,436.00         |
| Brenda Horn-Edwards | Paralegal | N/A                 | N/A               | \$360.00    | 4.10               | \$1,476.00         |
| <b>TOTAL:</b>       |           |                     |                   |             | <b>71.70</b>       | <b>\$49,421.00</b> |

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients.

A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A.**

**NOTICE AND OBJECTION PROCEDURES**

3. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

4. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by January 23, 2024 (the “Objection Deadline”) setting forth the nature of the objection and the amount of fees or expenses at issue.

5. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 50% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: January 8, 2024

BURNS BAIR LLP

/s/ Timothy W. Burns

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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

**EXHIBIT A**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
[www.BurnsBair.com](http://www.BurnsBair.com)

**The Official Committee of Unsecured Creditors  
of The Roman Catholic Diocese of Rockville  
Centre**

**Issue Date :** 12/21/2023  
**Bill # :** 01298

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

| <b>Date</b> | <b>Timekeeper</b>   | <b>Narrative</b>   | <b>Hours</b> | <b>Amount</b> |
|-------------|---------------------|--|--------------|---------------|
| 11/1/2023   | Brian Cawley        | Continue analyzing Arrowood policies for aggregate limits, if any, applicable to CVA claims (.6);  | 0.60         | \$252.00      |
| 11/1/2023   | Jesse Bair          | Participate in call with J. Stang and T. Burns re status hearing outcome, test cases, and case next-steps (.4);  | 0.40         | \$250.00      |
| 11/1/2023   | Timothy Burns       | Participate in call with state court counsel re test cases (.2); participate in conference with T. Burns re outcome of Oct. 31 Committee meeting and preparations for Nov. 1 status conference (.3); attend November 1 status hearing in main case (1.1); participate in hearing debrief with J. Bair re outcome of same (.1); participate in call with state court counsel re same (.2); review state court counsel correspondence re test cases (.1); participate in call with J. Stang and J. Bair re status hearing outcome, test cases, and case next-steps (.4); | 2.40         | \$2,340.00    |
| 11/1/2023   | Jesse Bair          | Supplemental analysis re potential, additional test cases (.3);  | 0.30         | \$187.50      |
| 11/1/2023   | Jesse Bair          | Review and consider additional correspondence with state court counsel re test case issues (.1);   | 0.10         | \$62.50       |
| 11/1/2023   | Jesse Bair          | Attend portion of November 1 status hearing (.2); participate in conference with T. Burns re outcome of status hearing (.1);   | 0.30         | \$187.50      |
| 11/1/2023   | Brenda Horn-Edwards | Draft Burns Bair ninth interim fee application (1.6); revise declaration of T. Burns (.2); draft exhibits for interim fee application (.8); correspond with J. Bair re same (.1);  | 2.70         | \$972.00      |

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| 11/1/2023   | Jesse Bair    | Participate in conference with T. Burns re outcome of Committee meeting and preparations for Nov. 1 status conference (.3);                | 0.30       | \$187.50      |
| 11/1/2023   | Jesse Bair    | Participate in call with state court counsel re test cases issues and next -steps (.3);  | 0.30       | \$187.50      |
| 11/2/2023   | Jesse Bair    | Analysis re additional, potential test cases (.3); review and respond to correspondence with state court counsel re same (.3);             | 0.60       | \$375.00      |
| 11/2/2023   | Jesse Bair    | Participate in conference with PSZJ re Plan issues, case strategy, and next-steps (.5);  | 0.50       | \$312.50      |
| 11/3/2023   | Timothy Burns | Participate in call with J. Stang and state court counsel re test cases (.5); conference with J. Bair re test case issues (.1);            | 0.60       | \$585.00      |
| 11/3/2023   | Jesse Bair    | Conference with T. Burns re test case issues (.1);   | 0.10       | \$62.50       |
| 11/3/2023   | Brian Cawley  | Additional analysis re Arrowood policies for aggregate limits, if any, applicable to CVA claims (.7);                                      | 0.70       | \$294.00      |
| 11/3/2023   | Jesse Bair    | Correspondence with K. Dine re state court counsel meeting and test case issues (.1);  | 0.10       | \$62.50       |
| 11/6/2023   | Jesse Bair    | Prepare for additional call with state court counsel re test cases issues (.1); participate in call with state court counsel re same (.5); | 0.60       | \$375.00      |
| 11/6/2023   | Jesse Bair    | Participate in call with state court counsel re potential test cases (.1);   | 0.10       | \$62.50       |
| 11/6/2023   | Jesse Bair    | Supplemental analysis re additional potential test cases (.3); correspondence with state court counsel re same (.2);                       | 0.50       | \$312.50      |
| 11/7/2023   | Jesse Bair    | Continued analysis re potential test cases (.4); review and respond to numerous correspondence with state court counsel re same (.5);      | 0.90       | \$562.50      |
| 11/7/2023   | Jesse Bair    | Provide instructions to N. Kuenzi re analysis needed re Guarantee Fund issues in connection with potential test cases (.1);                | 0.10       | \$62.50       |
| 11/7/2023   | Brian Cawley  | Correspondence with J. Bair re potential test case (.1);   | 0.10       | \$42.00       |
| 11/7/2023   | Jesse Bair    | Participate in call with state court counsel and PSZJ re test case strategy (.3);  | 0.30       | \$187.50      |
| 11/7/2023   | Jesse Bair    | Participate in conference with T. Burns re potential test cases and related insurance issues (.2);   | 0.20       | \$125.00      |
| 11/7/2023   | Timothy Burns | Participate in conference with J. Bair re potential test cases and related insurance issues (.2);  | 0.20       | \$195.00      |
| 11/8/2023   | Jesse Bair    | Review J. Stang memorandum re potential revised Plan structure (.1);   | 0.10       | \$62.50       |
| 11/8/2023   | Jesse Bair    | Correspondence with state court counsel re test case issues (.1);  | 0.10       | \$62.50       |

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| 11/8/2023   | Nathan Kuenzi | Draft summary of issues relating to commencement of Article 74 liquidation proceedings (.4);  | 0.40       | \$168.00      |
| 11/8/2023   | Jesse Bair    | Correspond with I. Nasatir re research results re Guarantee Fund question in connection with potential test cases (.1);   | 0.10       | \$62.50       |
| 11/8/2023   | Nathan Kuenzi | Draft analysis on issue of whether UILA and New York law will enforce the Delaware court order staying litigation involving Arrowood insureds (.4);   | 0.40       | \$168.00      |
| 11/8/2023   | Nathan Kuenzi | Participate in discussion with T. Burns re Arrowood liquidation and supplemental research needed in connection with same (.4);  | 0.40       | \$168.00      |
| 11/8/2023   | Nathan Kuenzi | Draft analysis of stay imposed by Delaware Chancery Court (.3);   | 0.30       | \$126.00      |
| 11/8/2023   | Timothy Burns | Prepare for meeting with PSZJ re Plan issues and test case proposal (.1); participate in conference with PSZJ and J. Bair re same (.9); preliminary analysis re Arrowood liquidation issues (.4); participate in meeting with N. Kuenzi re supplemental research needed in connection with same (.4); participate in calls with state court counsel re same (.4); participate in call with J. Stang re same (.3); review and analyze Arrowood liquidation order and related materials (.9); | 3.40       | \$3,315.00    |
| 11/8/2023   | Nathan Kuenzi | Analyze Delaware Chancery Court liquidation order, issues involving guaranty funds, and reciprocity between states regarding UILA in connection with Arrowood (1.2);  | 1.20       | \$504.00      |
| 11/8/2023   | Jesse Bair    | Prepare for meeting with PSZJ re Plan issues and test case proposal (.1); participate in conference with PSZJ and T. Burns re same (.9);  | 1.00       | \$625.00      |
| 11/8/2023   | Brian Cawley  | Preliminary consideration of test case issues in light of Arrowood liquidation (.1);  | 0.10       | \$42.00       |
| 11/8/2023   | Jesse Bair    | Review the Arrowood liquidation order (.2); preliminary analysis re case issues in connection with same (.2); participate in call with T. Burns re same (.1); review T. Burns email memorandum re same (.1);  | 0.60       | \$375.00      |
| 11/9/2023   | Jesse Bair    | Participate in conference with T. Burns re Arrowood liquidation and test case impact of same (.4);  | 0.40       | \$250.00      |
| 11/9/2023   | Jesse Bair    | Participate in additional call with state court counsel re Arrowood liquidation and impact on case (.3);  | 0.30       | \$187.50      |
| 11/9/2023   | Nathan Kuenzi | Research issues relating to New York guaranty fund in light of Arrowood insolvency (.6);  | 0.60       | \$252.00      |

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| 11/9/2023   | Nathan Kuenzi | Participate in discussion with T. Burns re pending issues in Arrowood liquidation and ongoing projects re same (.2);  | 0.20        | \$84.00       |
| 11/9/2023   | Jesse Bair    | Participate in additional conference with T. Burns re impact of Arrowood liquidation order (.1);  | 0.10        | \$62.50       |
| 11/9/2023   | Jesse Bair    | Review and respond to various correspondence with state court counsel re Arrowood liquidation and test case plan (.3);  | 0.30        | \$187.50      |
| 11/9/2023   | Jesse Bair    | Participate in call with state court counsel re Arrowood liquidation and test case issues (.4);   | 0.40        | \$250.00      |
| 11/9/2023   | Jesse Bair    | Additional analysis of test case issues in light of Arrowood liquidation and stay of proceedings (.7);  | 0.70        | \$437.50      |
| 11/9/2023   | Jesse Bair    | Review correspondence from the mediators re Arrowood liquidation (.1);  | 0.10        | \$62.50       |
| 11/9/2023   | Timothy Burns | Conference with J. Bair re Arrowood liquidation and test case impact of same (.4); participate in call with state court counsel re Arrowood issues (.2); follow-up meeting with J. Bair re same (.1); participate in call with PSZJ re Arrowood and test cases (.7); review correspondence with J. Bair and state court counsel re test cases (.2); review article re Arrowood liquidation (.1); review correspondence from the mediators re Arrowood liquidation (.1); continued analysis re case insurance strategy in light of Arrowood developments (.3); participate in conference with N. Kuenzi re pending issues in Arrowood liquidation and ongoing projects re same (.2); | 2.30        | \$2,242.50    |
| 11/9/2023   | Jesse Bair    | Participate in meeting with PSZJ and T. Burns re Arrowood liquidation, impact on bankruptcy case, and test case issues (.7);  | 0.70        | \$437.50      |
| 11/10/2023  | Jesse Bair    | Correspondence with particular state court counsel re test case issues (.1);  | 0.10        | \$62.50       |
| 11/10/2023  | Jesse Bair    | Participate in state court counsel meeting for insurance purposes re Arrowood developments, test cases, and related issues (1.2); participate in post-meeting call with PSZJ re outcome of state court counsel meeting and next-steps re same (.3); participate in conference with T. Burns re insurance and test case strategy (.2);   | 1.70        | \$1,062.50    |
| 11/10/2023  | Nathan Kuenzi | Continue researching issues relating to guaranty fund recovery in New York in connection with Arrowood and draft email memorandum re same (1.5);  | 1.50        | \$630.00      |
| 11/10/2023  | Jesse Bair    | Finalize correspondence to state court counsel group re Arrowood developments and upcoming state court counsel meeting (.2);  | 0.20        | \$125.00      |

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| 11/10/2023  | Timothy Burns       | Participate in state court counsel meeting for insurance purposes re Arrowood developments, test cases, and related issues (1.2); supplemental call with state court counsel re same (.2); participate in conference with J. Bair re insurance and test case strategy (.2); | 1.60        | \$1,560.00    |
| 11/12/2023  | Jesse Bair          | Review draft correspondence to the Committee re Arrowood developments (.1); participate in conference with T. Burns re same (.2);   | 0.30        | \$187.50      |
| 11/12/2023  | Jesse Bair          | Review and edit current version of the Committee's suspension and test case motion (.8);  | 0.80        | \$500.00      |
| 11/12/2023  | Timothy Burns       | Review proposed correspondence re Arrowood to the Committee and state court counsel (.2); met with J. Bair re same (.2); review and revise current draft of the Committee's test case and suspension motion (.8);   | 1.20        | \$1,170.00    |
| 11/12/2023  | Jesse Bair          | Review draft Committee correspondence to the mediators re Arrowood developments (.1);   | 0.10        | \$62.50       |
| 11/12/2023  | Jesse Bair          | Review the Diocese's letter to Judge Steinmann re Arrowood issues (.1);   | 0.10        | \$62.50       |
| 11/12/2023  | Jesse Bair          | Review and edit BB's interim fee application (.7);  | 0.70        | \$437.50      |
| 11/13/2023  | Timothy Burns       | Conference with J. Bair re test cases and Plan strategy (.2); attend part of call with PSZJ and J. Bair re potential Plan structure (.8);   | 1.00        | \$975.00      |
| 11/13/2023  | Jesse Bair          | Correspondence with B. Michael re test case status and next-steps (.1); additional correspondence with state court counsel re same (.2);  | 0.30        | \$187.50      |
| 11/13/2023  | Jesse Bair          | Additional analysis re potential test cases and related insurance issues (.8); review and respond to correspondence with state court counsel re same (.4);  | 1.20        | \$750.00      |
| 11/13/2023  | Jesse Bair          | Review J. Stang memo re revised potential Plan structure (.2); participate in call with PSZJ and T. Burns re same (1.0);  | 1.20        | \$750.00      |
| 11/13/2023  | Brenda Horn-Edwards | Review and revise ninth interim fee application (.4); correspond with J. Bair re same (.1);   | 0.50        | \$180.00      |
| 11/13/2023  | Jesse Bair          | Review correspondence with K. Dine, the Committee, and state court counsel re Arrowood developments (.1);   | 0.10        | \$62.50       |
| 11/13/2023  | Jesse Bair          | Review, edit, and finalize BB's ninth interim fee application (.7);   | 0.70        | \$437.50      |
| 11/13/2023  | Jesse Bair          | Correspondence with the Debtor re upcoming meet and confer with Arrowood (.1);  | 0.10        | \$62.50       |
| 11/13/2023  | Jesse Bair          | Conference with T. Burns re test cases and Plan strategy (.2);  | 0.20        | \$125.00      |

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| 11/14/2023 Jesse Bair          |          | Review correspondence with LMI and the Debtor re LMI's subpoenas (.1);  | 0.10        | \$62.50       |
| 11/14/2023 Jesse Bair          |          | Additional analysis re potential test case and related issues (.2); correspondence with state court counsel re same (.1);   | 0.30        | \$187.50      |
| 11/14/2023 Brenda Horn-Edwards |          | Edit ninth interim fee application (.1);  | 0.10        | \$36.00       |
| 11/14/2023 Jesse Bair          |          | Provide instructions to B. Cawley re additional analysis needed re potential LMI/Interstate test cases (.3);  | 0.30        | \$187.50      |
| 11/14/2023 Jesse Bair          |          | Review and respond to correspondence with PSZJ re test case issues and state court counsel meeting re same (.3); participate in conference with T. Burns re same (.2);  | 0.50        | \$312.50      |
| 11/14/2023 Brian Cawley        |          | Conduct additional analysis of potential LMI/Interstate test cases and draft summary re same (2.8); correspond with J. Bair re same (.2);   | 3.00        | \$1,260.00    |
| 11/14/2023 Jesse Bair          |          | Review monthly Diocesan PSIP information (.1);  | 0.10        | \$62.50       |
| 11/14/2023 Timothy Burns       |          | Met with J. Bair re test cases and state court counsel meeting re same (.2); participate in call with state court counsel re same (.1); review correspondence re Diocese's CVA files (.1); review correspondence with J. Bair and PSZJ re test cases (.1); additional analysis re Arrowood liquidation issues (.1);   | 0.60        | \$585.00      |
| 11/15/2023 Jesse Bair          |          | Participate in call with state court counsel re test case issues and strategy (.3);   | 0.30        | \$187.50      |
| 11/15/2023 Jesse Bair          |          | Call with T. Burns re developments re test cases (.2);  | 0.20        | \$125.00      |
| 11/15/2023 Jesse Bair          |          | Review J. Stang correspondence with the Debtor re settlement discussions (.1);  | 0.10        | \$62.50       |
| 11/15/2023 Timothy Burns       |          | Call with J. Bair re developments re test cases (.2); review correspondence and draft letter to court re Arrowood developments (.2); review correspondence with J. Bair and B. Cawley re test case issues (.1); review correspondence from state court counsel re test cases (.1); review correspondence from state court counsel to the Debtor re protective order issues (.3); review correspondence from state court counsel re case resolution issues (.2); review correspondence from K. Dine re dispute with debtor re NDAs and state court litigation (.1); review N. Kuenzi's supplemental memo re Arrowood guarantee fund issues (.2); | 1.40        | \$1,365.00    |
| 11/15/2023 Jesse Bair          |          | Participate in call with different state court counsel re test case issues and strategy (.2);   | 0.20        | \$125.00      |
| 11/15/2023 Jesse Bair          |          | Review the Debtor's letter and accompanying exhibits re use of CVA materials (.2); review state court counsel response to same (.2);  | 0.40        | \$250.00      |

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| 11/15/2023 Jesse Bair    |          | Additional analysis re test case issues and strategy (.2); correspondence with state court counsel re same (.2);   | 0.40        | \$250.00      |
| 11/15/2023 Nathan Kuenzi |          | Conduct follow-up research re issues relating to insurance guaranty fund recovery in New York in connection with Arrowood (.8);  | 0.80        | \$336.00      |
| 11/16/2023 Jesse Bair    |          | Review draft joint letter to Judge Cave re the Arrowood liquidation Order (.1); correspondence with Arrowood and the Diocese re same (.1);   | 0.20        | \$125.00      |
| 11/16/2023 Timothy Burns |          | Participate in call with J. Bair and state court counsel re test case issues and strategy (.7); review and revise current version of the Committee's test case and suspension motion (1.1); correspondence with PSZJ re same (.1); review order from J. Schofield re status letter (.1); | 2.00        | \$1,950.00    |
| 11/16/2023 Jesse Bair    |          | Prepare for call with certain state court counsel re test case issues and strategy (.1); participate in call with certain state court counsel re same (.7);  | 0.80        | \$500.00      |
| 11/16/2023 Jesse Bair    |          | Review and edit revised version of the Committee's suspension and test case motion (1.3); correspondence with PSZJ re same (.2);   | 1.50        | \$937.50      |
| 11/16/2023 Jesse Bair    |          | Review additional correspondence with state court counsel re test case issues and strategy (.1);   | 0.10        | \$62.50       |
| 11/17/2023 Jesse Bair    |          | Review the Committee's dispute notice re CVA materials under the case protective order (.1);   | 0.10        | \$62.50       |
| 11/17/2023 Jesse Bair    |          | Review correspondence with state court counsel re test case issues and related strategy (.1);  | 0.10        | \$62.50       |
| 11/17/2023 Jesse Bair    |          | Participate in call with state court counsel re test case insurance issues (.2);   | 0.20        | \$125.00      |
| 11/17/2023 Jesse Bair    |          | Review Order staying the Arrowood district court action (.1);  | 0.10        | \$62.50       |
| 11/18/2023 Timothy Burns |          | Review correspondence with PSZJ and state court counsel re test case call (.2); review correspondence from state court counsel and the Debtor re settlement issues (.2); review and revise latest iterations of the Committee's test case and suspension motion (.4);                    | 0.80        | \$780.00      |
| 11/18/2023 Jesse Bair    |          | Review B. Michael correspondence re state court counsel meeting to discuss test case issues and strategy (.1);   | 0.10        | \$62.50       |
| 11/19/2023 Jesse Bair    |          | Review and edit revised version of suspension / test case motion (.4); review and edit further revised version of suspension /test case motion (.2); correspondence with T. Burns and PSZJ re same (.1);   | 0.70        | \$437.50      |

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| 11/20/2023  | Timothy Burns       | Review correspondence from the Debtor re settlement/dismissal issues (.1);  | 0.10        | \$97.50       |
| 11/20/2023  | Jesse Bair          | Review final version of the Committee's test case / suspension motion (.2); correspondence with PSZJ re same (.1);  | 0.30        | \$187.50      |
| 11/20/2023  | Timothy Burns       | Conference with J. Bair re case status and test case motion (.1);   | 0.10        | \$97.50       |
| 11/20/2023  | Timothy Burns       | Participate in state court counsel meeting for insurance purposes re test case issues (.8); participate in post-meeting call with PSZJ and J. Bair re outcome of same and next-steps (.2);  | 1.00        | \$975.00      |
| 11/20/2023  | Jesse Bair          | Conference with T. Burns re case status and test case motion (.1)   | 0.10        | \$62.50       |
| 11/20/2023  | Jesse Bair          | Participate in state court counsel meeting for insurance purposes re test case issues (.8); participate in post-meeting call with PSZJ and T. Burns re outcome of same and next-steps (.2);   | 1.00        | \$625.00      |
| 11/20/2023  | Jesse Bair          | Review the Debtor's letter to state court counsel re settlement and dismissal issues (.1);  | 0.10        | \$62.50       |
| 11/21/2023  | Jesse Bair          | Conference with T. Burns re settlement developments (.1);   | 0.10        | \$62.50       |
| 11/21/2023  | Jesse Bair          | Review the Debtor's letter to Judge Steinman re the Committee's test case motion and state court actions (.1); review correspondence with state court counsel re same (.1);   | 0.20        | \$125.00      |
| 11/21/2023  | Timothy Burns       | Conference with J. Bair re settlement developments (.1);  | 0.10        | \$97.50       |
| 11/22/2023  | Jesse Bair          | Review and assess upcoming case insurance deadlines and projects (.1);  | 0.10        | \$62.50       |
| 11/25/2023  | Timothy Burns       | Review remand decision re state court actions (.1); review related correspondence re same (.1); review joint update letter to Judge Schofield (.1); review the Committee and Debtor's correspondence to Judge Steinman re test cases (.1); review letter from the Debtor to Judge Oetken re Arrowood stay (.1); | 0.50        | \$487.50      |
| 11/26/2023  | Brenda Horn-Edwards | Draft Burns Bair monthly fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);  | 0.80        | \$288.00      |
| 11/27/2023  | Jesse Bair          | Review Judge Oetken's order re POC appeals and impact of Arrowood liquidation (.1); further analysis re scope of Arrowood litigation stay (.1);   | 0.20        | \$125.00      |
| 11/27/2023  | Timothy Burns       | Review agenda for Nov. 28 hearing (.1); correspond with B. Cawley re assignment re same (.1); met with J. Bair re Arrowood aspect of status hearing (.1); follow-up correspondence re same (.1);  | 0.40        | \$390.00      |

|                          |  |      |            |
|--------------------------|--|------|------------|
| 11/27/2023 Jesse Bair    | Review agenda for upcoming status conference (.1); review K. Dine correspondence re same (.1);   | 0.20 | \$125.00   |
| 11/27/2023 Jesse Bair    | Prepare for upcoming case status conference with particular focus on Arrowood issues (.7); participate in conference with T. Burns re same (.1);   | 0.80 | \$500.00   |
| 11/27/2023 Brian Cawley  | Analyze and identify key materials for Nov. 28 hearing prep re Arrowood issues (.5);   | 0.50 | \$210.00   |
| 11/27/2023 Jesse Bair    | Review the parties' letter to Judge Schofield re bankruptcy case developments (.1);  | 0.10 | \$62.50    |
| 11/27/2023 Jesse Bair    | Review the Debtor's letter to Judge Glenn re upcoming status conference and related exhibits to same (.2);   | 0.20 | \$125.00   |
| 11/27/2023 Jesse Bair    | Correspondence with PSZJ re disclosure statement hearing date (.1);  | 0.10 | \$62.50    |
| 11/28/2023 Jesse Bair    | Analyze insurance demand letter issues (.2); edit and revise T. Burns correspondence to state court counsel re same (.2);  | 0.40 | \$250.00   |
| 11/28/2023 Brian Cawley  | Review correspondence from T. Burns re insurance demand letter strategy (.1);  | 0.10 | \$42.00    |
| 11/28/2023 Jesse Bair    | Correspondence with PSZJ re revised disclosure hearing date (.1);  | 0.10 | \$62.50    |
| 11/28/2023 Jesse Bair    | Participate in case status hearing for insurance purposes (1.6);   | 1.60 | \$1,000.00 |
| 11/28/2023 Jesse Bair    | Brief review re the Debtor's Plan and Disclosure Statement (.1);   | 0.10 | \$62.50    |
| 11/28/2023 Jesse Bair    | Continue preparing for insurance aspects of upcoming status conference (.1);   | 0.10 | \$62.50    |
| 11/28/2023 Jesse Bair    | Correspondence with state court counsel re finalization of insurance demand letters (.1);  | 0.10 | \$62.50    |
| 11/28/2023 Jesse Bair    | Participate in call with T. Burns re outcome of status conference and insurance next-steps (.2);   | 0.20 | \$125.00   |
| 11/28/2023 Jesse Bair    | Correspondence with B. Cawley re current version of insurance demand letters (.1);   | 0.10 | \$62.50    |
| 11/28/2023 Brian Cawley  | Review latest version of insurance demand letters (.2); correspondence with J. Bair re same (.2);  | 0.40 | \$168.00   |
| 11/28/2023 Timothy Burns | Attended Nov. 28 case status hearing (1.6); prepare memo to state court counsel re same and demand letters (.8); correspondence with BB team re same (.2); participate in call with J. Bair re status conference hearing outcome and insurance next steps (.2); revise and finalize memo to state court counsel re hearing outcome and demand letter issues (.3); participate in call with J. Stang re same (.2); additional correspondence with state court counsel re same (.2); | 3.50 | \$3,412.50 |

11/29/2023 Jesse Bair

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11/29/2023 Brian Cawley

Correspondence with particular state court counsel re finalization of insurance demand letters (.1); participate in call with state court counsel re same (.1);

0.20 \$125.00

11/29/2023 Timothy Burns

Review and revise insurance demand letters to incorporate partner edits (.5); correspondence with J. Bair re same (.2);

0.70 \$294.00

11/29/2023 Jesse Bair

Review correspondence with J. Bair and state court counsel re insurance demands (.1); Review and respond to correspondence with various state court counsel re insurance demand letters (.5);

0.10 \$97.50

11/29/2023 Jesse Bair

Correspondence with B. Cawley re additional edit to certain insurance demand letters (.1);

0.50 \$312.50

11/30/2023 Jesse Bair

Participate in call with state court counsel re insurance demand letters (.1);

0.10 \$62.50

**Total Hours and Fees****71.70 \$49,421.00**

#### Timekeeper Summary

| <b>Name</b>         | <b>Title</b> | <b>Hours</b> | <b>Rate</b> | <b>Amount</b> |
|---------------------|--------------|--------------|-------------|---------------|
| Brenda Horn-Edwards | Paralegal    | 4.10         | \$360.00    | \$1,476.00    |
| Brian Cawley        | Associate    | 6.20         | \$420.00    | \$2,604.00    |
| Jesse Bair          | Partner      | 32.30        | \$625.00    | \$20,187.50   |
| Nathan Kuenzi       | Associate    | 5.80         | \$420.00    | \$2,436.00    |
| Timothy Burns       | Partner      | 23.30        | \$975.00    | \$22,717.50   |

**Total Due This Invoice: \$49,421.00**